

ATTACHMENT 3

TRIBAL 106 GRANT PROGRAM PROJECT WORK PLAN FOR FY 2007 INSTRUCTIONS

Grants under the Water Pollution Control Program (CWA Section 106) are awarded to eligible Indian tribes to administer programs for the prevention, reduction, and elimination of water pollution, including the development and implementation of groundwater protection strategies. To assist you in preparing your proposal, Region 8 is providing instructions for developing work plans and budgets. For an Indian tribe to be eligible, it must have met the requirements set forth in 40 C.F.R. 130.6(d), and the limitations found in 40 C.F.R. 35.260.

In order to be eligible for the funds, a tribe must have first met the eligibility requirements for the program as defined under the CWA Section 518 (previously known as "treatment as a state"). If you are currently administering a CWA 106 water quality program, you have met the eligibility requirement and may apply for a grant. If you have not applied before, you must first establish eligibility by applying to EPA under the CWA Section 518. Information on the establishment of program eligibility can be obtained from your Tribal Program Manager in the Region 8 Tribal Assistance Program.

I. WORK PLAN PREPARATION

A. **Introduction/Background Statement:** Provide a narrative statement about the reservation including:

1. Description of population, land area, dominant land uses, and major surface water bodies and size;
2. Describe Tribe's primary water quality concerns;
3. Explain Tribe's long term (3-5 year) water quality program vision, goals, and objectives;
4. Define, in narrative or outline format, Tribe's monitoring strategy to prevent, reduce or eliminate water pollution on the reservation;
5. Indicate the year the Tribe received 106 grant TAS, date of last QAPP approval, date of last QAPP revision, and a statement on how much historical data has been migrated to the Region 8 STORET system; and,
6. Include a map of the Reservation showing major rivers, streams, lakes and monitoring locations and water body delineations, if completed.

B. **Project Workplan:** Allowable grant activities for this CWA Section 106 Program will be released soon in the CWA 106 National Program Guidance. A work plan must comply with applicable federal statutes, regulations, circulars, executive orders and delegation or authorization agreements, and **at a minimum** must specify:

1. The work plan components to be funded under the grant

2. The estimated work years and estimated funding amount for each work plan component
3. The work plan commitments for each work plan component and a time frame for accomplishing these commitments
4. A performance evaluation process and reporting schedule for both the work plan reports and the assessments reports.
5. The roles and responsibilities of the recipient and EPA in carrying out the work plan commitments
6. Environmental outcomes, the results, effects or consequences that will occur from carrying out the environmental program or activity that is related to a work plan's environmental or programmatic goal or objective (this section may also be used to describe the environmental outcomes which may occur by not performing these efforts)
7. Environmental outputs, environmental activities or efforts, and associated work products related to an environmental goal or objective that will be produced or provided as a deliverable under the grant.
8. A budget: Financial needs include personnel costs, consultant costs, travel, equipment, supplies and materials, laboratory services and overhead costs (e.g., office space, computer equipment and service, telephones). **The level of staff effort outlined in the work plan must be reflected in the budget breakout.** In other words, if you have 3 FTE in your budget, then the work plan must reflect 3 FTE or 6240 hours of work.

Complete these sections as they would reflect FY 2007-2008 activities only. If the new work plan proposes to contain activities carried forward from last year's work plan, they need to be highlighted for easy recognition. An **example** of the format and components for the proposal is on page 9.

C. Budget Proposal: Detailed budgets should be prepared for submission to EPA (See Attachment 5). List all staff that will be needed for the program year, including temporary or seasonal employees that you may hire. Also include a detailed summary of the work plan costs within the budget proposal. Please use the following format as guidance to complete your budget:

1. **Personnel:** All staff that will be needed for the program, i.e., coordinators, technicians, clerical staff, including part-time assistants. List the position, its duties and function and an estimated number of hours, and costs for each position. If a position is shared with another program, show only the portion that will be charged to the Section 106 Program, and explain how time and attendance will be recorded.
2. **Fringe Benefits:** Health Insurance, life insurance, retirement, etc.
3. **Travel:** Travel costs for all related work under your work plan are allowable under the grant. In your budget, separate local and out-of-state travel costs. Travel costs should include an estimate for all training that staff will attend during the year. Mileage for personal vehicles may be charged for local activities (i.e., water quality monitoring, meetings, etc.). However, mileage can't be reimbursed if a government vehicle is used.

Costs for government vehicles are typically captured under contract costs if paid under a contract with GSA or other vendor. Travel costs should list purpose, destination, number of trips, and estimated costs.

4. **Training:** As part of your proposal and work plan, EPA is requesting tribes to include projected training needs and a plan for obtaining this training. As tribes develop this training plan, the need for specific training should be linked to the environmental outcomes that this training will support. This plan should include cost estimates for training, type of training and the estimated dates of training. This effort is to support the tribe's capability to fully develop their expertise in support of their water quality program, and enables tribes to achieve self sustaining and self directed water quality programs.
5. **Equipment:** List the type, number and amount of equipment that will be needed. Tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of more than \$5,000 needs to comply with 40 C.F.R Part 31.3.
6. **Supplies:** Provide a general breakout of supplies (i.e., office and field data collection supplies) and their costs.
7. **Contractual:** An important purpose of CWA 106 funding is to build Tribal capacity. This is a key component of the CWA 106 program. The development of tribally-administered and implemented water quality program activities is one of the foundations of this EPA program. EPA supports the use of contractors to provide unique technical expertise or for specific capacity building purposes. List the nature of contractual services (i.e., lab analyses, technical assistance dealing with monitoring and water quality standards, data management, and analysis activities) and an estimate of the total costs. If you propose the use of contractors, include a proposed strategy and program to migrate this expertise to Tribal personnel. This strategy should outline the process and steps needed to train and to prepare the Tribal water quality staff to develop the expertise and conduct the work itself within a reasonable time frame.
8. **Construction:** Not allowed under CWA Section 106 grants.

II. REPORTING AND EVALUATION REQUIREMENTS

You will be required to submit a semi-annual and an annual performance report. The semi-annual report is due 30 days after the end of the reporting period and the annual performance report is due 90 days after the grant year. **Quarterly reports may be required at the discretion of the Project Officer.**

Reports must include the following information:

1. A discussion of accomplishments as measured against work plan commitments;
2. A self-evaluation and measurable description of cumulative effectiveness on the work performed under all work plan components;

3. A discussion of existing and potential problem areas; and
4. Suggestions for improvement, including, where feasible, schedules for making improvements.
5. If work plan commitments are not addressed, include a narrative justification.
6. Information on expenditures to date.
7. Description of any data analysis conducted and the conclusions reached.

Your Tribal Program Manager will continue to have informal discussions with you about the progress made under the CWA Section 106 programs. It is essential that progress reports be received timely. **Reimbursement requests may be delayed for delinquent reports.** The reporting format must be consistent with the work plan format. Required report lengths will vary depending on whether it is a quarterly, semi-annual or an annual report. **As guidance, the standard length for narrative reports are:** Quarterly (1-3) pages, Semi-Annual (2-4), and Annual (4-6).

Example Work Plan Component

Component 1: Based on a review of last year's water quality data, the Tribe will maintain 15 sampling sites throughout the Minnow Creek Watershed and intensify sampling efforts in Stone Creek. Stone Creek, a tributary to Minnow Creek, contributes a large amount of sediment and may be impacted by open range grazing during spring and summer months.

Commitments:

- 1) Service monitoring equipment prior to the sampling season.
- 2) Conduct annual review and update the QAPP & SAP for necessary changes to ensure consistency with EPA guidance and regulation.
- 3) Ensure water quality technician(s) and coordinators receive and have adequate training/orientation consistent with the tribe's training plan.
- 4) Collect chemical, biological and/or physical habitat samples pursuant to the SAP.
- 5) Maintain field records of data collection episodes and follow QAPP and SAP for data collection procedure, handling, storage and recording.
- 6) Perform data analysis and interpretation on historical and current water quality data.
- 7) Enter data into STORET.

Output and Time frame

- | | | |
|----|---|----------------|
| 1) | Develop an equipment checklist and maintenance schedule | 3/15/07 |
| 2) | QAPP & SAP are updated to reflect current monitoring needs | 3/15/07 |
| 3) | Trained WQ Technicians | 4/31/07 |
| 4) | WQ samples are collected pursuant to approved QAPP & SAP | 4/1/07-3/30/08 |
| 5) | WQ Field records of data collection episodes are recorded | 4/1/07-3/30/08 |
| 6) | Historical and current data is analyzed (validated, quality checked, graphed, statistically analyzed, and compared to Tribal water quality standards) dates | |
| 7) | All data that has been analyzed (as per output 6 above) and is entered into STORET dates | |

Outcome

- 1) Faulty equipment is identified and repaired resulting in efficient field sampling. (Equipment may be beyond repair and need replacement, resulting in new equipment list and inclusion in upcoming work plan and budget request.)
- 2) Adherence to QAPP & SAP will result in data collected that is technically reliable and legally defensible.
- 3) Qualified staff capable to perform assigned monitoring responsibilities.
- 4) Monitoring data is available to determine water quality.
- 5) Information on field data collection is available for quality control

- 6) Analytical data can be stored, retrieved, and evaluated. Results of analysis may identify areas and contaminants of concerns. Lack of detects may require SAP modifications. Proper data storage permits the Tribe to document improvement in water quality as a result of these efforts.
- 7) Enhance data management capability to import historical data, present visual depiction of data, initiate data interpretation, and utilize results to improve water quality protection efforts.

Expected Cost of Component #1: \$38,000

Expected Work Years: 0.5 FTE (1040 hours)

Example 2 – Work Plan Format

Tribe Name: Any Region 8 Tribe

Grant No: I-9981234

Region 8

Clean Water Act, Section 106 Work Plan

Workplan Component 1:

Based on a review of last year's water quality data, the Tribe will maintain 15 sampling sites throughout the Minnow Creek Watershed and intensify sampling efforts in Stone Creek. Stone Creek, a tributary to Minnow Creek, contributes a large amount of sediment and may be impacted by open range grazing during spring and summer months.

Environmental Outcome(s):

Increase tribal knowledge and understanding for all waters (streams, lakes, wetlands, groundwater) for chemical, physical, and biological conditions.
Goal is to cover 80% of tribal waters by 2009

Intermediate Outcome(s) (this grant period):

- 1) Faulty equipment is identified and repaired resulting in efficient field sampling. (Equipment may be beyond repair and need replacement, resulting in new equipment list and inclusion in upcoming work plan and budget request.)
- 2) Adherence to QAPP & SAP will result in data collected that is technically reliable and legally defensible.
- 3) Qualified staff capable to perform assigned monitoring responsibilities.
- 4) Monitoring data is available to determine water quality
- 5) Information on field data collection is available for quality control
- 6) Analytical data can be stored, retrieved, and evaluated. Results of analysis may identify areas and contaminants of concerns. Lack of detects may require SAP modifications. Proper data storage permits the Tribe to document improvement in water quality as a result of these efforts.
- 7) Enhance data management capability to import historical data, present visual depiction of data, initiate data interpretation, and utilize results to improve water quality protection efforts.

COMMITMENTS		PRIMARY CAPACITY AREA	DATES DUE	OUTPUTS AND DELIVERABLES	EST. COST	EST. FTE
1.1	Service monitoring equipment prior to the sampling season.	Technical	3/15/07	Equipment checklist and maintenance schedule.		
1.2	Conduct annual review and update the QAPP and SAP for necessary changes to ensure consistency with EPA guidance and regulation.	Technical	3/15/07	Updated QAPP and SAP		
1.3	Ensure water quality technician(s) and coordinators receive and have adequate training/orientation consistent with the tribe's training.	Administrative	4/30/07	1. Trained Water Quality Technicians 2. Staff Training Plans		
1.4	Collect chemical, biological, and/or physical habitat samples pursuant to the SAP.	Technical	Monthly	Water Quality samples collected pursuant to approved QAPP and SAP		
1.5	Maintain field records of data collection episodes and follow QAPP and SAP for data collection procedure, handling, storage and recording.	Technical	Monthly	Field records of data collection episodes are recorded.		
1.6	Perform data analysis and interpretation on historical and current water quality data.	Technical	Monthly	Historical and current data is analyzed (validated, quality checked, graphed, statistically analyzed, and compared to tribal water quality standards).		
1.7	Enter data into STORET.	Administrative	Monthly	All data that has been analyzed (per Output 6 above) is entered into STORET		
Total – Component 1 (To total Cost and FTE columns, click on this line in each column and go: Table/Formula/=sum(above))					\$38,000	0.5
<u>EPA Use Only</u> <div style="text-align: center;">2003-2008 EPA Strategic Plan</div> Goal: 2 Clean and Safe Water Objective: 2.2 Protect Water Quality Sub-objective: 2.2.1 Improve Water Quality on a Watershed Basis						

Example 3: Workplan and Report Format Combined (Costs & FTE identified as a total rather than by element).

Exhibit X.X FY07 CWA Section 106 Work Plan October 1, 2006 – September 30, 2007					
Work Plan Component 1: Develop strategy to protect manage all waters within tribal boundaries Tribal Multi Year Water Quality Management and Protection Plan (the plan should include the issues identified in the TEP).					
Environmental Outcome: <ul style="list-style-type: none"> - Increase tribal knowledge and understanding for all waters (streams, lakes, wetlands, groundwater) for chemical, physical, and biological conditions to cover 20% of tribal waters by 2009 - Establish management plans and codes to reduce exposure to pollutant loadings to tribal streams by 20% by 2020 Intermediate Outcome (this grant period): Draft a WQMP plan. The Tribal Water Quality Management and Protection plan will be a multi year master plan identifying the Tribe's goals and plans for managing and protecting the Tribes water sources. (The Tribe, through the current FY05 PPG grant, is working to complete an environmental inventory and communication plan, which are necessary for developing the WQMP).					
Estimated Cost: \$ 65K				Estimated Work Years: 1.0 FTE	
COMMITMENTS		PRIMARY CAPACITY AREA	ESTIMATED TASK COST (optional)	DATE	OUTPUTS AND DELIVERABLES
1. 1	Develop a multi-year WQMP in accordance with guidance stated in the description above and send to EPA PO for review and comment. The plan will be developed in accordance with the Draft Clean Water Act 106 Guidance and the recommendations outlined in the EPA project officer's 4/4/06 e-mail. A vehicle, GIS/GPS assistance, training, and contractual services may be required.	Technical and Non Administrative		June 30, 2007	Draft WQM plan with the following elements: <ol style="list-style-type: none"> 1. Incorporate parts III (#9-13), V(#4 and 5), and VIII of your completed environmental inventory: 2. Goals - choose an approach or combination

					<ul style="list-style-type: none"> 3. Monitoring strategy for all waters (with the most detail on the items to be done first) for at least pH, DO, temp, and turbidity (chapter 3). 4. Outreach - how do you plan to educate and keep the tribe up to date on water quality concerns and more; 5. Reporting – list out requirements for reporting to EPA
1. 2	Incorporate EPA PO comments into final draft WQMP and submit to EPA PO	Technical and Non Administrative		September 30, 2007	Revised Draft WQMP incorporating EPA comments
1. 3	Watershed & Stream Investigation, stabilization, & Restoration Workshop – University of Toledo, Bancroft Campus – Course is Free of Charge	Technical and Non Administrative		November 2006	
<u>EPA Use Only</u> <div style="text-align: center;">2003-2008 EPA Strategic Plan</div> Goal 2: Clean and Safe Water Objective 2.2: Protect Water Quality Sub-objective 2.2.1: Improve Water Quality on a Watershed Basis					

Tribe of USA
FY 07 Performance Report for Component 1

PLEASE NOTE: Provide as much narrative as necessary to convey progress against workplan commitment. These examples are brief ONLY because Judy Hervig did not want to type a whole lot of information into just an example...!!!! Reporting requirements are in accordance with 40 CFR Part 30.51(b) or 40 CFR Part 31.40(b)(1). The format includes the five sections referenced in the Performance/Progress Reports Special Condition of your Award.

1st Quarter Performance Report 10/1/06 – 12/31/06 Attended Watershed & Stream Investigation, stabilization, & Restoration Workshop – University of Toledo, Bancroft Campus – Course was Free of Charge - This course was much beneficial in preparing the draft multi year QWMP. I met professors that are willing to come to the Tribe to provide additional training and assistance as we move into the next phases of this work plan component. Completed November 2006 Certificate of Training attached.

2nd Quarter Performance Report 1/1/07 – 3/31/07: Reviewing materials obtained from the Watershed & Stream investigation Workshop in preparation for developing the 1st WQMP draft. Considerable time spent in conversation with the course instructor.

3rd Quarter Performance Report 4/1/07 – 6/30/07:

Developed the draft a multi-year WQMP in accordance with guidance stated in the description above and send to EPA PO for review and comment.

4th Quarter Performance Report 6/30/07 – 9/30/07: EPA PO comments have been incorporated into the final draft WQMP and submitted back to EPA PO.
completed